

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	
	§	

**MOTION TO ADOPT CO-DEFENDANTS' MOTIONS TO DISMISS**

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman and presents this his Motion To Adopt Motions to Dismiss Filed By Co-Defendants Constantinescu, Rybarczyk and Hennessey, and would show this Court the following:

**I.**

Mr. Cooperman requests permission to adopt the following motions previously filed by co-defendants on May 10 and 12, 2023, to wit: **Doc # 262, Doc #264, and Doc # 265**. Adoption by Mr. Cooperman will maximize this Court's efficiency and reduce the number of pretrial motions filed by Mr. Cooperman. This Court has the inherent authority to allow Defendants to adopt these Motions and the Government cannot be prejudiced by adoption.

WHEREFORE PREMISES CONSIDERED, Mr. Cooperman respectfully requests this Court allow him to adopt the arguments set out in the Motions to Dismiss DE 262, 264, 265.

Respectfully Submitted,

/s/ Chip Lewis

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Defendant's Motion to Adopt has been forward via electronic mail to the Government on this the 12<sup>th</sup> day of May 2023.

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/s/ Chip Lewis  
CHIP LEWIS